

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

Williams
Plaintiff(s),

v.

CIVIL ACTION
NO. 13-10083-FDS

Spencer
Defendant(s),

Defendants' Proposed
SCHEDULING ORDER

SAYLOR, J.

This Scheduling Order is intended to provide a reasonable timetable for discovery and motion practice in order to help ensure a fair and just resolution of this matter without undue expense or delay.

Timetable for Discovery and Motion Practice

Pursuant to Rule 16(b) of the Federal Rules of Civil Procedure and Local Rule 16.1(F), it is hereby ORDERED that:

1. **Initial Disclosures.** Initial disclosures required by Fed. R. Civ. P. 26(a)(1) must be completed by September 19, 2013
2. **Amendments to Pleadings.** Except for good cause shown, no motions seeking leave to add new parties or to amend the pleadings to assert new claims or defenses may be filed after February 6, 2014
3. **Fact Discovery - Interim Deadlines.**
 - a. Written discovery (requests for production of documents, interrogatories and request for admissions) shall be served no later than December 19, 2013
 - b. All depositions, other than expert depositions, must be completed by February 19, 2014
4. **Fact Discovery - Final Deadline.**
All discovery, other than expert discovery, must be completed by February 19, 2014
5. **Status Conference.** A status conference will be held on _____.

6. Expert Discovery.

- a. Plaintiff(s)' trial experts must be designated, and the information contemplated by Fed. R. Civ. P. 26(a)(2) must be disclosed, by _____.
- b. Plaintiff(s)' trial experts must be deposed by _____.
- c. Defendant(s)' trial experts must be designated, and the information contemplated by Fed. R. Civ. P. 26(a)(2) must be disclosed, by N/A.
- d. Defendant(s)' trial experts must be deposed by N/A.

7. Dispositive Motions.

- a. Dispositive motions, such as motions for summary judgment or partial summary judgment and motions for judgment on the pleadings, must be filed by April 18, 2014.
- b. Oppositions to dispositive motions must be filed within 30 days after service of the motion.

8. Initial Pretrial Conference. An initial pretrial conference will be held on _____ at _____ a.m./p.m.

The parties shall prepare and submit a pretrial memorandum in accordance with Local Rule 16.5(D) five business days prior to the date of the conference, except that the parties need not include matters required by Local Rule 16.5(D)(2) or (3).

Procedural Provisions

1. **Extension of Deadlines.** Motions to extend or modify deadlines will be granted only for good cause shown. All motions to extend shall contain a brief statement of the reasons for the request; a summary of the discovery, if any, that remains to be taken; and a specific date when the requesting party expects to complete the additional discovery, join other parties, amend the pleadings, or file a motion.
2. **Motions to Compel or Prevent Discovery.** Except for good cause shown, motions to compel discovery, motions for protective orders, motions to quash, motions to strike discovery responses, and similar motions must be filed no later than the close of fact discovery or the close of expert discovery, whichever deadline is relevant. If additional discovery is compelled by the court after the relevant deadline has passed, the court may enter such additional orders relating to discovery as may be appropriate.
3. **Reply Memoranda.** Parties need not seek leave of court to file a reply memorandum in response to an opposition to any motion, provided that such a reply memorandum does